

✓  
APR 1 2013  
CLERK'S OFFICE  
U.S. DISTRICT COURT  
DISTRICT OF NEVADA

GREGORY DANAHER  
7901 Quill Gordon Ave  
Las Vegas, NV 89149  
g.danaher@gmail.com  
702-490-0085  
PRO SE

2013 MAY 28 P 3:59

UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

100 110 120 130 140 150 160 170 180 190 200 210 220 230 240 250 260 270 280 290 300 310 320 330 340 350 360 370 380 390 400 410 420 430 440 450 460 470 480 490 500 510 520 530 540 550 560 570 580 590 600 610 620 630 640 650 660 670 680 690 700 710 720 730 740 750 760 770 780 790 800 810 820 830 840 850 860 870 880 890 900 910 920 930 940 950 960 970 980 990 1000 1010 1020 1030 1040 1050 1060 1070 1080 1090 1100 1110 1120 1130 1140 1150 1160 1170 1180 1190 1200 1210 1220 1230 1240 1250 1260 1270 1280 1290 1300 1310 1320 1330 1340 1350 1360 1370 1380 1390 1400 1410 1420 1430 1440 1450 1460 1470 1480 1490 1500 1510 1520 1530 1540 1550 1560 1570 1580 1590 1600 1610 1620 1630 1640 1650 1660 1670 1680 1690 1700 1710 1720 1730 1740 1750 1760 1770 1780 1790 1800 1810 1820 1830 1840 1850 1860 1870 1880 1890 1900 1910 1920 1930 1940 1950 1960 1970 1980 1990 1995 2000 2005 2010 2015 2020 2025 2030 2035 2040 2045 2050 2055 2060 2065 2070 2075 2080 2085 2090 2095 2100 2105 2110 2115 2120 2125 2130 2135 2140 2145 2150 2155 2160 2165 2170 2175 2180 2185 2190 2195 2200 2205 2210 2215 2220 2225 2230 2235 2240 2245 2250 2255 2260 2265 2270 2275 2280 2285 2290 2295 2300 2305 2310 2315 2320 2325 2330 2335 2340 2345 2350 2355 2360 2365 2370 2375 2380 2385 2390 2395 2400 2405 2410 2415 2420 2425 2430 2435 2440 2445 2450 2455 2460 2465 2470 2475 2480 2485 2490 2495 2500 2505 2510 2515 2520 2525 2530 2535 2540 2545 2550 2555 2560 2565 2570 2575 2580 2585 2590 2595 2600 2605 2610 2615 2620 2625 2630 2635 2640 2645 2650 2655 2660 2665 2670 2675 2680 2685 2690 2695 2700 2705 2710 2715 2720 2725 2730 2735 2740 2745 2750 2755 2760 2765 2770 2775 2780 2785 2790 2795 2800 2805 2810 2815 2820 2825 2830 2835 2840 2845 2850 2855 2860 2865 2870 2875 2880 2885 2890 2895 2900 2905 2910 2915 2920 2925 2930 2935 2940 2945 2950 2955 2960 2965 2970 2975 2980 2985 2990 2995 2998 3000 3002 3004 3006 3008 3010 3012 3014 3016 3018 3020 3022 3024 3026 3028 3030 3032 3034 3036 3038 3040 3042 3044 3046 3048 3050 3052 3054 3056 3058 3060 3062 3064 3066 3068 3070 3072 3074 3076 3078 3080 3082 3084 3086 3088 3090 3092 3094 3096 3098 3100 3102 3104 3106 3108 3110 3112 3114 3116 3118 3120 3122 3124 3126 3128 3130 3132 3134 3136 3138 3140 3142 3144 3146 3148 3150 3152 3154 3156 3158 3160 3162 3164 3166 3168 3170 3172 3174 3176 3178 3180 3182 3184 3186 3188 3190 3192 3194 3196 3198 3200 3202 3204 3206 3208 3210 3212 3214 3216 3218 3220 3222 3224 3226 3228 3230 3232 3234 3236 3238 3240 3242 3244 3246 3248 3250 3252 3254 3256 3258 3260 3262 3264 3266 3268 3270 3272 3274 3276 3278 3280 3282 3284 3286 3288 3290 3292 3294 3296 3298 3300 3302 3304 3306 3308 3310 3312 3314 3316 3318 3320 3322 3324 3326 3328 3330 3332 3334 3336 3338 3340 3342 3344 3346 3348 3350 3352 3354 3356 3358 3360 3362 3364 3366 3368 3370 3372 3374 3376 3378 3380 3382 3384 3386 3388 3390 3392 3394 3396 3398 3400 3402 3404 3406 3408 3410 3412 3414 3416 3418 3420 3422 3424 3426 3428 3430 3432 3434 3436 3438 3440 3442 3444 3446 3448 3450 3452 3454 3456 3458 3460 3462 3464 3466 3468 3470 3472 3474 3476 3478 3480 3482 3484 3486 3488 3490 3492 3494 3496 3498 3500 3502 3504 3506 3508 3510 3512 3514 3516 3518 3520 3522 3524 3526 3528 3530 3532 3534 3536 3538 3540 3542 3544 3546 3548 3550 3552 3554 3556 3558 3560 3562 3564 3566 3568 3570 3572 3574 3576 3578 3580 3582 3584 3586 3588 3590 3592 3594 3596 3598 3600 3602 3604 3606 3608 3610 3612 3614 3616 3618 3620 3622 3624 3626 3628 3630 3632 3634 3636 3638 3640 3642 3644 3646 3648 3650 3652 3654 3656 3658 3660 3662 3664 3666 3668 3670 3672 3674 3676 3678 3680 3682 3684 3686 3688 3690 3692 3694 3696 3698 3700 3702 3704 3706 3708 3710 3712 3714 3716 3718 3720 3722 3724 3726 3728 3730 3732 3734 3736 3738 3740 3742 3744 3746 3748 3750 3752 3754 3756 3758 3760 3762 3764 3766 3768 3770 3772 3774 3776 3778 3780 3782 3784 3786 3788 3790 3792 3794 3796 3798 3800 3802 3804 3806 3808 3810 3812 3814 3816 3818 3820 3822 3824 3826 3828 3830 3832 3834 3836 3838 3840 3842 3844 3846 3848 3850 3852 3854 3856 3858 3860 3862 3864 3866 3868 3870 3872 3874 3876 3878 3880 3882 3884 3886 3888 3890 3892 3894 3896 3898 3900 3902 3904 3906 3908 3910 3912 3914 3916 3918 3920 3922 3924 3926 3928 3930 3932 3934 3936 3938 3940 3942 3944 3946 3948 3950 3952 3954 3956 3958 3960 3962 3964 3966 3968 3970 3972 3974 3976 3978 3980 3982 3984 3986 3988 3990 3992 3994 3996 3998 4000 4002 4004 4006 4008 4010 4012 4014 4016 4018 4020 4022 4024 4026 4028 4030 4032 4034 4036 4038 4040 4042 4044 4046 4048 4050 4052 4054 4056 4058 4060 4062 4064 4066 4068 4070 4072 4074 4076 4078 4080 4082 4084 4086 4088 4090 4092 4094 4096 4098 4099 4100 4101 4102 4103 4104 4105 4106 4107 4108 4109 4110 4111 4112 4113 4114 4115 4116 4117 4118 4119 4120 4121 4122 4123 4124 4125 4126 4127 4128 4129 4130 4131 4132 4133 4134 4135 4136 4137 4138 4139 4140 4141 4142 4143 4144 4145 4146 4147 4148 4149 4150 4151 4152 4153 4154 4155 4156 4157 4158 4159 4160 4161 4162 4163 4164 4165 4166 4167 4168 4169 4170 4171 4172 4173 4174 4175 4176 4177 4178 4179 4180 4181 4182 4183 4184 4185 4186 4187 4188 4189 4190 4191 4192 4193 4194 4195 4196 4197 4198 4199 4200 4201 4202 4203 4204 4205 4206 4207 4208 4209 4210 4211 4212 4213 4214 4215 4216 4217 4218 4219 4220 4221 4222 4223 4224 4225 4226 4227 4228 4229 4230 4231 4232 4233 4234 4235 4236 4237 4238 4239 4240 4241 4242 4243 4244 4245 4246 4247 4248 4249 4250 4251 4252 4253 4254 4255 4256 4257 4258 4259 4260 4261 4262 4263 4264 4265 4266 4267 4268 4269 4270 4271 4272 4273 4274 4275 4276 4277 4278 4279 4280 4281 4282 4283 4284 4285 4286 4287 4288 4289 4290 4291 4292 4293 4294 4295 4296 4297 4298 4299 4299 4300 4301 4302 4303 4304 4305 4306 4307 4308 4309 4310 4311 4312 4313 4314 4315 4316 4317 4318 4319 4320 4321 4322 4323 4324 4325 4326 4327 4328 4329 4330 4331 4332 4333 4334 4335 4336 4337 4338 4339 4340 4341 4342 4343 4344 4345 4346 4347 4348 4349 4350 4351 4352 4353 4354 4355 4356 4357 4358 4359 4360 4361 4362 4363 4364 4365 4366 4367 4368 4369 4369 4370 4371 4372 4373 4374 4375 4376 4377 4378 4379 4379 4380 4381 4382 4383 4384 4385 4386 4387 4388 4389 4389 4390 4391 4392 4393 4394 4395 4396 4397 4398 4399 4399 4400 4401 4402 4403 4404 4405 4406 4407 4408 4409 4409 4410 4411 4412 4413 4414 4415 4416 4417 4418 4419 4419 4420 4421 4422 4423 4424 4425 4426 4427 4428 4429 4429 4430 4431 4432 4433 4434 4435 4436 4437 4438 4439 4439 4440 4441 4442 4443 4444 4445 4446 4447 4448 4449 4449 4450 4451 4452 4453 4454 4455 4456 4457 4458 4459 4459 4460 4461 4462 4463 4464 4465 4466 4467 4468 4469 4469 4470 4471 4472 4473 4474 4475 4476 4477 4478 4479 4479 4480 4481 4482 4483 4484 4485 4486 4487 4488 4489 4489 4490 4491 4492 4493 4494 4495 4496 4497 4498 4498 4499 4499 4500 4501 4502 4503 4504 4505 4506 4507 4508 4509 4509 4510 4511 4512 4513 4514 4515 4516 4517 4518 4519 4519 4520 4521 4522 4523 4524 4525 4526 4527 4528 4529 4529 4530 4531 4532 4533 4534 4535 4536 4537 4538 4539 4539 4540 4541 4542 4543 4544 4545 4546 4547 4548 4549 4549 4550 4551 4552 4553 4554 4555 4556 4557 4558 4559 4559 4560 4561 4562 4563 4564 4565 4566 4567 4568 4569 4569 4570 4571 4572 4573 4574 4575 4576 4577 4578 4579 4579 4580 4581 4582 4583 4584 4585 4586 4587 4588 4589 4589 4590 4591 4592 4593 4594 4595 4596 4597 4598 4598 4599 4599 4600 4601 4602 4603 4604 4605 4606 4607 4608 4609 4609 4610 4611 4612 4613 4614 4615 4616 4617 4618 4619 4619 4620 4621 4622 4623 4624 4625 4626 4627 4628 4629 4629 4630 4631 4632 4633 4634 4635 4636 4637 4638 4639 4639 4640 4641 4642 4643 4644 4645 4646 4647 4648 4649 4649 4650 4651 4652 4653 4654 4655 4656 4657 4658 4659 4659 4660 4661 4662 4663 4664 4665 4666 4667 4668 4669 4669 4670 4671 4672 4673 4674 4675 4676 4677 4678 4679 4679 4680 4681 4682 4683 4684 4685 4686 4687 4688 4689 4689 4690 4691 4692 4693 4694 4695 4696 4697 4698 4698 4699 4699 4700 4701 4702 4703 4704 4705 4706 4707 4708 4709 4709 4710 4711 4712 4713 4714 4715 4716 4717 4718 4719 4719 4720 4721 4722 4723 4724 4725 4726 4727 4728 4729 4729 4730 4731 4732 4733 4734 4735 4736 4737 4738 4739 4739 4740 4741 4742 4743 4744 4745 4746 4747 4748 4749 4749 4750 4751 4752 4753 4754 4755 4756 4757 4758 4759 4759 4760 4761 4762 4763 4764 4765 4766 4767 4768 4769 4769 4770 4771 4772 4773 4774 4775 4776 4777 4778 4779 4779 4780 4781 4782 4783 4784 4785 4786 4787 4788 4789 4789 4790 4791 4792 4793 4794 4795 4796 4797 4798 4798 4799 4799 4800 4801 4802 4803 4804 4805 4806 4807 4808 4809 4809 4810 4811 4812 4813 4814 4815 4816 4817 4818 4819 4819 4820 4821 4822 4823 4824 4825 4826 4827 4828 4829 4829 4830 4831 4832 4833 4834 4835 4836 4837 4838 4839 4839 4840 4841 4842 4843 4844 4845 4846 4847 4848 4849 4849 4850 4851 4852 4853 4854 4855 4856 4857 4858 4859 4859 4860 4861 4862 4863 4864 4865 4866 4867 4868 4869 4869 4870 4871 4872 4873 4874 4875 4876 4877 4878 4879 4879 4880 4881 4882 4883 4884 4885 4886 4887 4888 4889 4889 4890 4891 4892 4893 4894 4895 4896 4897 4898 4898 4899 4899 4900 4901 4902 4903 4904 4905 4906 4907 4908 4909 4909 4910 4911 4912 4913 4914 4915 4916 4917 4918 4919 4919 4920 4921 4922 4923 4924 4925 4926 4927 4928 4929 4929 4930 4931 4932 4933 4934 4935 4936 4937 4938 4939 4939 4940 4941 4942 4943 4944 4945 4946 4947 4948 4949 4949 4950 4951 4952 4953 4954 4955 4956 4957 4958 4959 4959 4960 4961 4962 4963 4964 4965 4966 4967 4968 4969 4969 4970 4971 4972 4973 4974 4975 4976 4977 4978 4979 4979 4980 4981 4982 4983 4984 4985 4986 4987 4988 4989 4989 4990 4991 4992 4993 4994 4995 4996 4997 4998 4998 4999 4999 5000 5001 5002 5003 5004 5005 5006 5007 5008 5009 5009 5010 5011 5012 5013 5014 5015 5016 5017 5018 5019 5019 5020 5021 5022 5023 5024 5025 5026 5027 5028 5029 5029 5030 5031 5032 5033 5034 5035 5036 5037 5038 5039 5039 5040 5041 5042 5043 5044 5045 5046 5047 5048 5049 5049 5050 5051 5052 5053 5054 5055 5056 5057 5058 5059 5059 5060 5061 5062 5063 5064 5065 5066 5067 5068 5069 5069 5070 5071 5072 5073 5074 5075 5076 5077 5078 5079 5079 5080 5081 5082 5083 5084 5085 5086 5087 5088 5089 5089 5090 5091 5092 5093 5094 5095 5096 5097 5098 5098 5099 5099 5100 5101 5102 5103 5104 5105 5106 5107 5108 5109 5109 5110 5111 5112 5113 5114 5115 5116 5117 5118 5119 5119 5120 5121 5122 5123 5124 5125 5126 5127 5128 5129 5129 5130 5131 5132 5133 5134 5135 5136 5137 5138 5139 5139 5140 5141 5142 5143 5144 5145 5146 5147 5148 5149 5149 5150 5151 5152 5153 5154 5155 5156 5157 5158 5159 5159 5160 5161 5162 5163 5164 5165 5166 5167 5168 5169 5169 5170 5171 5172 5173 5174 5175 5176 5177 5178 5179 5179 5180 5181 5182 5183 5184 5185 5186 5187 5188 5189 5189 5190 5191 5192 5193 5194 5195 5196 5197 5198 5198 5199 5199 5200 5201 5202 5203 5204 5205 5206 5207 5208 5209 5209 5210 5211 5212 5213 5214 5215 5216 5217 5218 5219 5219 5220 5221 5222 5223 5224 5225 5226 5227 5228 5229 5229 5230 5231 5232 5233 5234 5235 5236 5237 5238 5239 5239 5240 5241 5242 5243 5244 5245 5246 5247 5248 5249 5249 5250 5251 5252 5253 5254 5255 5256 5257 5258 5259 5259 5260 5261 5262 5263 5264 5265 5266 5267 5268 5269 5269 5270 5271 5272 5273 5274 5275 5276 5277 5278 5279 5279 5280 5281 5282

to Stipulate. Due to the fact that *I am still waiting for such an response/agreement inquired about fifteen (15) days ago* regarding Plaintiff's motion to amend complaint which I first inquired about on the 13<sup>th</sup> of May, 2013, and today is the 28<sup>th</sup> of May, 2013, which I filed on the 24<sup>th</sup> of May, Plaintiff believes it's best to file this motion now, today, since this is an emergency due to time restraints and the current expiration of the ability for amending pleadings and adding parties is in one (1) weeks time.

**PLAINTIFF'S REASONS FOR NEEDING TO FILE THIS MOTION**

The timing currently set forth in the Scheduling Order is insufficient insomuch as the Scheduling Order will need to be amended due to, but not limited to, the following reasons:

- 1) The current timing prejudices Plaintiff by not allowing for any time to amend pleadings, ascertain the identity of individuals with liability or add new parties after the Second set of Production of documents or electronically stored information and Admissions, as well as the first set of Interrogatories, are due for response.
- 2) Also, upon information and belief, Plaintiff anticipates adding at least two (2) additional defendant(s) that violated Plaintiff's rights, however, as a natural consequence of Defendants uncooperative stance in discovery, Plaintiff has been prejudiced by Defendant not allowing the identity of the individual that obtained Plaintiff's consumer report to be known, so that Plaintiff may, among other things, depose the unidentified person(s) and ascertain whether or not the unidentified person(s) have liability in this case.
- 3) After Plaintiff realized he had additional violations to be adjudicated during the ongoing discovery process and thereby having developed a need to amend his

original complaint to add those violations and possible additional parties, Plaintiff realized that he requires additional time to amend pleadings and add defendants, and needed some of the current relevant Scheduling Order times to be extended to after the discovery cut off date, as to not impede Plaintiff's discovery requests responses and supplements thereof.

4) Plaintiff has also taken measures to mitigate the amount of time needed to be extended by filing discovery requests in regards to the new violations alleged in his amended complaint just days after having filed the motion to amend.

5) To extend time to allow for Plaintiff to conduct further discovery requests and supplements that the truth may be manifest in these matters and justice served.

6) Prior to Plaintiff's agreeing to the current scheduling order, which Defendants attorney formatted, Plaintiff was not aware of the actual need to add additional violations or Defendant(s) at that time.

7) Plaintiff was very forthcoming about the information needed in discovery and Defendant raised no objections to the materials and information I was requesting when I sent emails regarding these matters and after we spoke on the telephone prior to and during the time Plaintiffs first Request for Production of Documents or electronically stored information was looming, which led Plaintiff to believe that Defendant was going to be forthcoming with information. However, Plaintiff has not received any tangible information in the procurement of this discovery, and Plaintiff is being prejudiced by the natural consequences of the actions of Defendant and Defendant's attorneys, due to the fact that Defendant has not cooperated.

8) Furthermore, When Plaintiff raised these issues regarding Discovery, Defendants attorney indicated on several occasions that he would ask his client regarding certain matters relating to the discovery process but has not replied to me about any of my queries in a fair manner to bring resolution. Plaintiff feels his gestures to obtain discovery have largely been ignored by Defendant, creating a consequence, the natural effect thereof being, Plaintiff's effort to seek justice are being stymied or stalled.

9) If Counsel for Defendant had been more communicative and cooperative these discovery requests could be resolved without the necessity to involve the Court or extend time.

10) Also, Plaintiff may require additional time for compelling Defendant to produce or answer properly prior to the cutoff for amending pleadings or adding parties, and would ask the Court for input on setting proper scheduling order times if it's appropriate.

11) The current Scheduling Order reflects the following:

1)	Last day to amend pleadings or add parties:	June 04, 2013
2)	Expert disclosures:	July 03, 2013
3)	Discovery cutoff:	September 03, 2013
4)	Motion cutoff:	September 30, 2013
5)	Pre-Trial Order:	November 18, 2013
6)	Pre-Trial Disclosures:	November 18, 2013
7)	Trial:	December 16, 2013

"Any stipulation of motion must be made not later than August 13, 2013 – 21 days before the discovery cut-off date."

The Scheduling Order is signed by Magistrate Judge Peggy A. Leen on the 9<sup>th</sup> day of April, 2013.

12) If this Court has no input or finds it not appropriate to give input on the setting of proper times for the Scheduling Order, then Plaintiff requests that the times be adjusted to allow for additional time to amend pleadings and add parties as follows;

////

////

////

////

////

////

////

////

////

////

////

////

////

////

////

////

////

////

WHEREFORE, Plaintiff respectfully motions the Court to amend the Scheduling Order to allow for the necessary additional time to conduct discovery, amend pleadings and add defendants in those amended pleadings according to the following dates and statement;

PROPOSED NEW SCHEDULING ORDER

- 1) Last day to amend pleadings or add parties: October 03, 2013
- 2) Expert disclosures: November 03, 2013
- 3) Discovery cutoff: September 03, 2013
- 4) Motion cutoff: October 30, 2013
- 5) Pre-Trial Order: November 18, 2013
- 6) Pre-Trial Disclosures: November 18, 2013
- 7) Trial: December 16, 2013

Any stipulation of motion must be made not later than October 03, 2013 – 30 days after the discovery cut-off date.

Respectfully submitted this 28<sup>th</sup> day of May, 2013 by:



GREGORY DANAHER  
7901 Quill Gordon Ave  
Las Vegas, NV 89149  
g.danaher@gmail.com  
702-490-0085  
PRO SE

IT IS SO ORDERED:

---

Honorable Judge Andrew P. Gordon  
U.S. District Court Judge  
Dated: \_\_\_\_\_

**CERTIFICATE OF SERVICE**

I hereby certify that I served a true and correct copy of the above document **PLAINTIFF'S MOTION REQUESTING AN EXTENTION OF TIME**, and this Certificate of Service upon the attorney of record for the Defendant in this action, listed below, by mailing a copy thereof, postage prepaid, via first-class U.S. mail to the address listed below, on this 28<sup>th</sup> day of May, 2013.

FIRSTSOURCE ADVANTAGE, LLC  
C/O Gregory A Kraemer  
Of: COOPER LEVENSON  
ATTORNEYS AT LAW  
6060 Elton Avenue  
Las Vegas, NV 89107

By: 

GREGORY DANAHER  
7901 Quill Gordon Ave  
Las Vegas, NV 89149  
g.danaher@gmail.com  
702-490-0085  
PRO SE